

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

UNITED STATES OF AMERICA

v.

GEORGE AREF NADER,  
Defendant.

Case No. 1:19-CR-00201-LMB

**UNOPPOSED MOTION TO WITHDRAW AS COUNSEL**

Pursuant to Local Rule 57.4(G), Timothy H. McCarten files this motion to withdraw as counsel of record for Defendant George Aref Nader in the above-captioned matter.

Under Virginia’s Rules of Professional Conduct, “a lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if” specified criteria are met. Va. Rule of Prof’l Conduct 1.16(b).

Here, as Mr. Nader will continue to be represented in this action by his other counsel of record from KaiserDillon PLLC whose names appear below, “withdrawal can be accomplished without material adverse effects on the interests of the client.” *Id.*

Moreover, additional grounds exist, each of which independently would be sufficient to permit undersigned counsel’s withdrawal pursuant to Virginia Rule of Professional Conduct 1.16(b)(4) (permitting withdrawal “if . . . the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer’s services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled”), Rule 1.16(b)(5) (permitting withdrawal “if . . . the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client”), or Rule 1.16(b)(6) (permitting withdrawal “if . . . other good cause for withdrawal exists”).

Counsel for Mr. Nader have conferred regarding this Motion with Assistant United States Attorney Jay V. Prabhu, and the government does not oppose this Motion.

We respectfully request that Mr. McCarten's name be removed from the service list.

Dated: December 2, 2019

Respectfully submitted,  
LATHAM & WATKINS LLP

/s/ Timothy H. McCarten

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## CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2019, a true and correct copy of the foregoing Motion to Withdraw as Counsel was served on the following via the CM/ECF system:

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